

## UNITED STATES DISTRICT COURT

for the

EASTERN District of VirginiaALEXANDRIA Division

FILED

2021 JUN 21 A 11:43

MR. JENOME JULIUS BROWN  
MARRIOTT RESIDENCE INN SUITE 611  
CERTIFICATE OF ASSUMED REGISTRATION 7803736

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.  
 If the names of all the plaintiffs cannot fit in the space above,  
 please write "see attached" in the space and attach an additional  
 page with the full list of names.)

-V-

MHF ALEXANDRIA V LLC  
MARRIOTT CEE ANTHONY CAPUANO  
MC- MILL ROAD LLC  
THOMAS H. ANDREWS PARTNERSHIP

Defendant(s)

(Write the full name of each defendant who is being sued. If the  
 names of all the defendants cannot fit in the space above, please  
 write "see attached" in the space and attach an additional page  
 with the full list of names.)

Case No.

1:21-CV-00743-AJT-JFA  
 (to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

REGISTERED AGENT  
CORPORATION SERVICE COMPANY  
100 SHOE KEE SLIP 2ND FLOOR  
RICHMOND VIRGINIA 23219

## COMPLAINT FOR THE CONVERSION OF PROPERTY

(28 U.S.C. § 1332; Diversity of Citizenship)

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name CERTIFICATE OF ASSUMED, JENOME JULIUS BROWN  
 Street Address 2345 MILL ROAD, SUITE 611 PERMANENT RESIDENCE  
 City and County ALEXANDRIA  
 State and Zip Code VIRGINIA 22314  
 Telephone Number 703.310.1175 678.575.7710  
 E-mail Address brittany.ALEXANDER@marrriott.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

ATTN: MR. ROBERT A. INDEGLIA JR  
 MHE ALEXANDRIA VIRGINIA LLC  
 300 CENTERVILLE ROAD Suite 300 EAST  
 WARWICK  
 RHODE ISLAND 02886  
 SHANNON. MISTRETTA  
 COLA @ MARRIOTT.COM

## Defendant No. 2

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

MR. ANTHONY CAPUANO  
 Chief Executive and President  
 10400 FERNWOOD ROAD  
 BETHESDA  
 MARYLAND 20817  
 800 422 0728  
 ANTHONY.CAPUANO@MARRIOTT.COM

## Defendant No. 3

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

MG-MILL ROAD, LLC  
 GRANTOR, AND GRANTEE  
 464 SOUTH ULSTER STREET SUITE 1500  
 DENVER  
 COLORADO 80237

## Defendant No. 4

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

THOMAS H. ANDREWS PARTNERSHIP  
 GRANTOR, AND GRANTEE  
 4157 CHAIN BRIDGE ROAD  
 FAIRFAX  
 VIRGINIA 22030

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) US BOUNTY #1014, JEROME JULIUS BROWN, is a citizen of the State of (name) VIRGINIA, SUCCESSOR,

2. If the plaintiff is a corporation

The plaintiff, (name) US BOUNTY #1014 JEROME JULIUS BROWN, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, (name) MG - Mill Road, LLC, is a citizen of the State of (name) COLORADO. Or is a citizen of (foreign nation) \_\_\_\_\_

2. If the defendant is a corporation

The defendant, (name) MG - Mill Road, LLC, is incorporated under the laws of the State of (name) COLORADO, and has its principal place of business in the State of (name) COLORADO. Or is incorporated under the laws of (foreign nation) N/A, and has its principal place of business in (name) VIRGINIA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

## C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Quitclaim DEED, RECORDED REQUESTED BY EDWARD SEMONIAN CLERK, CIRCUIT RECORDED MAIL TO ALEXUS US COURIERS & TITLE SERVICES GRANTEE'S THIS QUITCLAIM DEED, EXECUTED ON JAN 4TH 2019 GRANTOR M6 MILL ROAD LLC CASE COMMENTS, BROWN, JEANME V' RESIDENCE INN BY MARRIOTT

## III. Statement of Claim

- A. Describe the property that you own that is the subject of this complaint, including its value. \$40,545.700

Lot Size Sq Ft 32511, ZONING CDD #2, YEAR BUILT 2008, CONSTRUCTION EXCELLENT Building condition EXCELLENT, HVAC WARM AND COOL AIR ZONE, Building type Hotel, Gross Building AREA Sq Ft 126.390 DATE OF QUERY JUNE 17, 2021

- B. How and when did you come to own the property?

CERTIFICATE OF ASSUMED, REGISTRATION NO. 7803736, MELISSA LISED BENITEZ, NOTARY PUBLIC COMMONWEALTH OF VIRGINIA, ALEXANDRIA CIRCUIT COURT, ACKNOWLEDGMENT 05032019 JEANME JULIUS BROWN OWNER MARRIOTT RESIDENCE INN AT CARLYLE

- C. How and when did the defendant(s) obtain possession of the property? Describe with particularity the actions the defendant(s) took to convert the property.

SALE DATE 0721 2006 GRANTOR M6 MILL ROAD LLC  
SALE DATE 0721 2006 GRANTOR M6 CARLYLE HOTEL INC  
SALE DATE 0718 2006 GRANTOR THOMAS H. ANDREWS PARTNERSHIP  
SALE DATE 0524 2006 GRANTOR THOMAS H. ANDREWS PARTNERSHIP

- D. (If the defendant(s) rightfully came into possession of the property): Describe how and when you notified the defendant(s) that the property belonged to you. Describe how and when you demanded that the defendant(s) deliver or return the property, and what response you received from the defendant(s). Attach a copy of any written correspondence with the defendant(s), if such copies exist.

OUTLINED ACKNOWLEDGEMENT OF RECEIPT CAPTION JEANME JULIUS BROWN SA. V' SMC PRESIDENT RONALD T. FRANK ETAL CASE # 1:18-CV-370 CRIMINAL COMPLAINT UNEXECUTED BY US MARSHAL, BASED ON FACTS MARRIOTT CREDIT CARD AUTHORIZATION FORM FILED 0430 2018 TOLD TO NOTICE AMENDED ONE YEAR STAY, DEFENDANTS ATTY JOHN T. FRANK AMENDED. SUBPOENA CIVIL ACTION 1:21-CV-475 WILL CALL MOTION 1:18-CV-370

## IV. Relief

State briefly and precisely what damages relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. CLAIMS 7 CASES JUDICIAL DEFAULT ENTITLED SUITE #611.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: JUNE 21<sup>TH</sup> 2021

Signature of Plaintiff

Printed Name of Plaintiff

MARRIOTT RESIDENCE INN Jerome Julius Brown SR  
MARRIOTT RESIDENCE INN JEROME JULIUS BROWN SR

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address